

**RESPONSES TO EPA REGION IX COMMENTS (dated April 10, 2002) TO PROPOSED
PERMIT # 1000044
FOR CHEMICAL LIME COMPANY - DOUGLAS LIME PLANT**

1. Missing Applicable Requirements

-- in several instances, emission limits in the existing permits for Chem Lime were not carried over into the Title V permit. For example, Attachment A -- Condition X(L) of Permit 0368-93 was not carried over into the Title V permit. The TSD states, "These numeric emission limits are not based on an applicable requirement. Therefore, they have not been carried over into Permit 1000044." EPA believes these numeric emission limits are applicable requirements which should be in the Title V permit, and ADEQ has provided no discussion as to why these are not applicable requirements. For example, Chem Lime may have agreed to take numeric emission limits in its old operating permits to net out of PSD or other requirements.

-- although the permit requires annual performance testing, some of the actual test methods were not included in the Title V permit. For example, R18-2-720H. requires reference test Methods 1-5, but these requirements are not in the Title V permit.

ADEQ Response:

-- The TSD has been updated in appropriate locations to justify removal of some operating and installation permit limits. Please review the discussions that have been added in Table 3 (Previous Permit Conditions) of the TSD, for the following permit conditions : (i) Permit 0368-93, Att A Condition X(L), (ii) Installation Permit 1233, Att B Condition II(C), (iii) Installation Permit 1222, Att A, Conditions V and IX.

--The language referring to applicable test methods has been added in Part I(G) of Attachment B.

2. Permit Shield

-- Section XXI Permit Shield language should be removed from Attachment A of the permit. This language is overbroad and shields everything in Attachment B. This permit shield language in Attachment A also seems to be redundant in that Attachment B already contains permit shield language for specific equipment.

ADEQ Response:

As suggested, Section XXI of Attachment A has been removed.

3. *Statement of Basis/TSD*

-- The TSD needs to contain PTE information for the specific equipment at Chem Lime. It is not sufficient to just reference the permit application for more specific information.

-- The Title V permit contains 3 alternate operating scenarios but there is no discussion of these AOSs in the TSD.

ADEQ Response:

A brief discussion regarding facility emissions has been added in Section III of the TSD. A brief discussion regarding the AOS's has been added in Section IX of the TSD.